IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WRS, INC., d/b/a WRS MOTION PICTURE LABORATORIES, a corporation,	CIVIL ACTION
	No. 00-2041
Plaintiff,	
vs.	
PLAZA ENTERTAINMENT, INC., a corporation, ERIC PARKINSON, an individual, CHARLES von BERNUTH, an individual and JOHN HERKLOTZ, an individual,	
Defendants.	

SUPPLEMENTAL AFFIDAVIT OF THOMAS E. REILLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMNENT AS TO DAMAGES

COMMONWEALTH OF PENNSYLVANIA)
) ss:
COUNTY OF ALLEGHENY)

Before me, the undersigned authority, a notary public, and before the aforesaid county and state, personally appeared Thomas E. Reilly who being duly sworn accordingly to law deposes and says the following:

1. That he is over the age of 18 years and competent to take an Affidavit.

2. That he is an attorney, who has been licensed to practice by the Supreme Court of the Commonwealth of Pennsylvania and in the United States District Court for the Western District of Pennsylvania since 1977.

3. That since November 12, 1999 he has been the president of the professional corporation known as Thomas E. Reilly, P.C. and in that capacity he is familiar with the manner in which the records of Thomas E. Reilly, P.C. are maintained and can state from personal knowledge that the information contained in those records is placed in those records at or near the times that the events recorded occur.

4. That Thomas E. Reilly, P.C. uses Time Slips billing program into which the time spent by each attorney on a matter is entered in increments of one tenth of an hour and each amount is then multiplied by the program by the applicable hourly rate to calculate the monetary charge for each of the recorded events.

5. That he has printed out and attached to this Affidavit the records of Thomas E. Reilly, P.C. from October 13, 2006 through December 19, 2006 displaying time recorded following the previously filed Affidavit.

6. That the hourly rate charged by Thomas E. Reilly, P.C. and specifically, Attorney Thomas E. Reilly, from the commencement of the engagement until approximately July of 2002 was the sum of $175.00 per hour.

7. That in July of 2003, Thomas E. Reilly, P.C. and Thomas E. Reilly entered into a new arrangement with WRS, Inc., which was approved by the Bankruptcy Court and permitted Thomas E. Reilly to charge the hourly rate of $200.00 per hour for services rendered with respect to WRS, Inc.

8. That, based upon the hourly rate and the time recorded as reflected in the attached time and billing information, the total amount accrued for attorney's fees from October 13, 2006 with respect to the enforcement of the obligation owed by Plaza Entertainment, Inc. and its guarantors to WRS, Inc. is and additional sum of $6,020.00.

Thomas E. Reilly

Sworn to and subscribed
before me this 19th day
of December, 2006.

Jamie N. Miller
Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Jamie N. Miller, Notary Public
Scott Twp., Allegheny County
My Commission Expires Jan. 29, 2008
Member, Pennsylvania Association of Notaries

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Selection Criteria

Slip.Classification	Open
Clie.Selection	Include: WRS.Plaza
Slip.Transaction ID	64205 - 66117
Slip.Slip Type	Time

Rate Info - identifies rate source and level

Slip ID Dates and Time Posting Status Description			Attorney Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
64205 10/13/2006 Billed Letter to Attorney John Sieminski, Attorney John Gibson, Eric Parkinson and Plaza Entertainment enclosing copies of all pleadings filed with the Court on October 13, 2006	TIME G:16767	 12/01/2006	Tom Correspondence WRS.Plaza	0.50 0.00 0.00 0.00	200.00 T@3	100.00
64260 10/18/2006 Billed Receive and review Order of Court directing Herklotz to respond to Motion for Summary Judgment for Damages	TIME G:16767	 12/01/2006	Tom Rec & Review WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
64349 10/26/2006 Billed Receive and review Motion for Extension of Time from Defendant, Herklotz	TIME G:16767	 12/01/2006	Tom Rec & Review WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
64403 10/05/2006 Billed Send e-mail to Jack Napor attaching the Affidavit and summary	TIME G:16767	 12/01/2006	Tom Send E-mail WRS.Plaza	0.30 0.00 0.00 0.00	200.00 T@3	60.00
64409 10/05/2006 Billed Receive e-mail from Jack Napor attaching the collections balance as of September 30, 2006 and summary of language on invoices	TIME G:16767	 12/01/2006	Tom RecE-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
64413 10/05/2006 Billed Send e-mail to Jack Napor about the interest that is being calculated and summary on calculating the unbilled finance charges	TIME G:16767	 12/01/2006	Tom Send E-mail WRS.Plaza	0.50 0.00 0.00 0.00	200.00 T@3	100.00

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Slip ID Dates and Time Posting Status Description			Attorney Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
64415 10/05/2006 Billed Receive e-mail from Jack Napor about using the unbilled items to demonstrate how conservatively we calculated the balance owed in the interest resolving this now	TIME G:16767	 12/01/2006	Tom RecE-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
64420 10/30/2006 Billed Letter to Jack Napor enclosing Motion requesting extension of time and Order granting same	TIME G:16767	 12/01/2006	Tom Correspondence WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
64446 10/10/2006 Billed Receive e-mail from Jack Napor attaching another copy of the work up (Collections - Plaza Balances as of September 30, 2006	TIME G:16767	 12/01/2006	Tom RecE-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
64448 10/10/2006 Billed Receive e-mail from Jack Napor attaching an Excel spreadsheet titled Plaza Numbers 10-10-06 and summary of interest calculation	TIME G:16767	 12/01/2006	Tom RecE-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
64454 10/11/2006 Billed Send e-mail to Jack Napor about coming in to the office tomorrow to sign the Affidavits	TIME G:16767	 12/01/2006	Tom Send E-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
64546 10/23/2006 Billed Receive e-mail from Attorney John Sieminski about planning on filing a Motion tomorrow for an extension of time to file responses; Request confirmation so he can present to the Court that the Motion is unopposed	TIME G:16767	 12/01/2006	Tom RecE-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
64555 10/25/2006 Billed Send e-mail to Attorney John Sieminski about trying to get the consent of Jack Napor; Advising that Jack Napor is out of the United States and have not been able to contact him therefore we can not consent to	TIME G:16767	 12/01/2006	Tom Send E-mail WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00

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Slip ID Dates and Time Posting Status Description			Attorney Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
the extension of time						
64576 11/05/2006 Billed Receive and review Motion requesting leave of court to file Reply to Response to Motion to Transfer	TIME G:16767	 12/01/2006	Tom Rec & Review WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
64646 10/03/2006 Billed Telephone call with Tom Claassen	TIME G:16767	 12/01/2006	Tom Call WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
64647 10/03/2006 Billed Telephone call with Tom Claassen (2nd)	TIME G:16767	 12/01/2006	Tom Call WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
64649 10/04/2006 Billed Telephone call with Jack Napor	TIME G:16767	 12/01/2006	Tom Call WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
64656 10/05/2006 Billed Review issues regarding Motion to Change Venue	TIME G:16767	 12/01/2006	Tom Review WRS.Plaza	2.50 0.00 0.00 0.00	200.00 T@3	500.00
64668 10/09/2006 Billed Retrieve records from Attorney John Sieminski; Review receivable list for exhibits; Revise Affidavit	TIME G:16767	 12/01/2006	Tom Review WRS.Plaza	3.00 0.00 0.00 0.00	200.00 T@3	600.00
64669 10/09/2006 Billed Telephone call with Attorney John Sieminski	TIME G:16767	 12/01/2006	Tom Call WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
64689 10/10/2006 Billed Telephone call from Jack Napor	TIME G:16767	 12/01/2006	Tom Call WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
64692 10/10/2006 Billed Complete revision of Motions and Brief	TIME G:16767	 12/01/2006	Tom Revise WRS.Plaza	3.50 0.00 0.00 0.00	200.00 T@3	700.00

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Slip ID Dates and Time Posting Status Description			Attorney Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
64699 10/11/2006 Billed Telephone call with Kathy of Judge Standish's Chambers	TIME G:16767	 12/01/2006	Tom Call WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
64745 11/09/2006 Billed Receive and review Reply Brief to Motion to Transfer	TIME G:16767	 12/01/2006	Tom Rec & Review WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
64816 11/09/2006 Billed Letter to Jack Napor enclosing opposing counsel's Reply to our Response	TIME G:16767	 12/01/2006	Tom Correspondence WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
65176 11/17/2006 Billed Receive and review document requests from Attorney Sieminski	TIME G:16767	 12/01/2006	Tom Rec & Review WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
65190 11/17/2006 Billed Receive and review correspondence from Attorney John Sieminski regarding time frame to receive documents	TIME G:16767	 12/01/2006	Tom Rec & Review WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
65205 11/20/2006 Billed Letter to Jack Napor regarding correspondence from Attorney John Sieminski and Plaza documents	TIME G:16767	 12/01/2006	Tom Correspondence WRS.Plaza	0.30 0.00 0.00 0.00	200.00 T@3	60.00
65258 11/22/2006 Billed Receive and review four separate requests from Attorney John Sieminski requesting documents	TIME G:16767	 12/01/2006	Tom Rec & Review WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
65271 11/27/2006 Billed Receive and review three requests for additional information from Attorney John Sieminski	TIME G:16767	 12/01/2006	Tom Rec & Review WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00

Slip ID Dates and Time Posting Status Description	Attorney Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
65278 TIME 11/27/2006 Billed G:16767 12/01/2006 Letter to Attorney John Sieminski regarding documents requested	Tom Correspondence WRS.Plaza	1.50 0.00 0.00 0.00	200.00 T@3	300.00
65279 TIME 11/27/2006 Billed G:16767 12/01/2006 Review of documents requested by Attorney John Sieminski	Tom Review WRS.Plaza	3.00 0.00 0.00 0.00	200.00 T@3	600.00
65296 TIME 11/28/2006 Billed G:16767 12/01/2006 Locate additional documents from request and revise correspondence to John Sieminski	Tom Miscellaneous WRS.Plaza	2.00 0.00 0.00 0.00	200.00 T@3	400.00
65302 TIME 11/29/2006 Billed G:16767 12/01/2006 Letter to Attorney John Sieminski regarding invoice from Schneider Downs	Tom Correspondence WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
65392 TIME 11/08/2006 Billed G:16767 12/01/2006 Review message from Tamara at Attorney John Sieminski's office about having a hard time reading the spreadsheets as provided in Exhibit 2 to Napor's affidavit; Request a better copy	Tom Review WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
65455 TIME 12/06/2006 WIP Receive and review Response to Motion for Summary Judgment/Brief in Support of Response/Response to Statement of Consise Facts/Appendix	Tom Rec & Review WRS.Plaza	0.50 0.00 0.00 0.00	200.00 T@3	100.00
65531 TIME 11/17/2006 Billed G:16767 12/01/2006 Receive e-mail from Attorney John Sieminski requesting answers to outstanding questions	Tom RecE-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
65564 TIME 11/21/2006 Billed G:16767 12/01/2006 Send e-mail to Attorney John Sieminski about not getting in touch with Jack Napor yet and advising that we have all the	Tom Send E-mail WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00

Slip ID Dates and Time Posting Status Description	Attorney Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
documents that were in his office; Requesting Attorney Sieminski to come to the office to locate appropriate documents				
65565 TIME 11/21/2006 Billed G:16767 12/01/2006 Receive e-mail from Attorney John Sieminski advising Chad Wissinger will come to our office to retrieve documents	Tom RecE-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
65570 TIME 11/21/2006 11/22/2006 Billed G:16767 12/01/2006 Receive e-mail from Attorney Chad Wissinger about coming to our office at 11:00 a.m. tomorrow morning; Request to take files with him or have a copy-service meet him here	Tom RecE-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
65574 TIME 11/21/2006 Billed G:16767 12/01/2006 Receive e-mail from Jack Napor providing inputs for responses	Tom RecE-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
65575 TIME 11/21/2006 Billed G:16767 12/01/2006 Receive e-mail from Jack Napor addressed to John Purdy attaching a list of questions needing answers	Tom RecE-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
65577 TIME 11/22/2006 Billed G:16767 12/01/2006 Receive e-mail from Patricia Boehler attaching two document requests from November 17, 2006 in Word format	Tom RecE-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
65583 TIME 11/22/2006 Billed G:16767 12/01/2006 Send e-mail to Jack Napor about the document that Parkinson and vonBernuth signed for a Bank of America lock box from which WRS Plaza and Central De video were to receive distributions not being in the NBOC box	Tom Send E-mail WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
65584 TIME 11/22/2006 Billed G:16767 12/01/2006	Tom Send E-mail WRS.Plaza	0.20 0.00 0.00	200.00 T@3	40.00

Slip ID Dates and Time Posting Status Description	Attorney Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
Send e-mail to John Purdy about the agreement which purports to set up an account from which some proceeds are to go to WRS, some to Plaza and some to Central De Video; Requesting information on how this document was received by John Purdy and whether any money came from it		0.00		
65585 TIME 11/22/2006 Billed G:16767 12/01/2006 Send e-mail to Jack Napor needing clarification on the Transaction Customer History Report of July 12, 2001 and invoice # 175711 and amount that was paid	Tom Send E-mail WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
65594 TIME 11/27/2006 Billed G:16767 12/01/2006 Receive e-mail from Jack Napor attaching Excel spreadsheet of the collections and Plaza billing May 1998 to present	Tom RecE-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
65595 TIME 11/27/2006 Billed G:16767 12/01/2006 Receive e-mail from Attorney John Sieminski requesting a legible version of the legal invoices that accompanied our Affidavit dated October 13, 2006	Tom RecE-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
65596 TIME 11/27/2006 Billed G:16767 12/01/2006 Receive e-mail from Attorney John Sieminski advising they have been working on the response to WRS's Motion for Summary Judgment as to Damages; Advising there were original documents found and were sent to be copied	Tom RecE-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
65597 TIME 11/28/2006 Billed G:16767 12/01/2006 Receive e-mail from Tamara Collier attaching copies of all document requests sent between November 22, 2006 and November 28, 2006	Tom RecE-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
65599 TIME 11/28/2006 Billed G:16767 12/01/2006 Send e-mail to Jack Napor attaching letter	Tom Send E-mail WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00

Slip ID Dates and Time Posting Status Description	Attorney Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
addressed to Attorney Sieminski and other documents to review before sending them to Attorney Sieminski				
65601 TIME 11/28/2006 Billed G:16767 12/01/2006 Receive e-mail from Jack Napor attaching a few comments notes in magenta color	Tom RecE-mail WRS.Plaza	0.10 0.00 0.00 0.00	200.00 T@3	20.00
65767 TIME 11/17/2006 Billed G:16767 12/01/2006 Telephone call with Attorney John Sieminski	Tom Call WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
65825 TIME 11/27/2006 Billed G:16767 12/01/2006 Telephone call with Jack Napor	Tom Call WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
65826 TIME 11/27/2006 Billed G:16767 12/01/2006 Telephone call with Attorney John Sieminski	Tom Call WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
65827 TIME 11/27/2006 Billed G:16767 12/01/2006 Telephone call with Jack Napor (2nd)	Tom Call WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
65863 TIME 11/29/2006 Billed G:16767 12/01/2006 Telephone call with Attorney John Sieminski	Tom Call WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00
66114 TIME 12/16/2006 WIP Prepare Reply to Response and Brief	Tom Prep Pleadings WRS.Plaza	2.50 0.00 0.00 0.00	200.00 T@3	500.00
66115 TIME 12/17/2006 WIP Revise Reply to Response and Brief	Tom Revise WRS.Plaza	1.50 0.00 0.00 0.00	200.00 T@3	300.00
66116 TIME 12/18/2006 WIP Telephone call with Jack Napor	Tom Call WRS.Plaza	0.20 0.00 0.00 0.00	200.00 T@3	40.00

Slip ID Dates and Time Posting Status Description	Attorney Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
68117 TIME 12/19/2006 WIP Complete Response Reply	Tom Prep Pleadings WRS Plaza	1.50 0.00 0.00 0.00	200.00 T@3	300.00

Grand Total			
	Billable	30.10	6020.00
	Unbillable	0.00	0.00
	Total	30.10	6020.00